

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

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| UNILOC 2017, LLC et al. Plaintiffs, v. | § CIVIL ACTION NOS. 2-18-cv-00491, § -492, -493, -494, -495, -496, -497, -498, § -499, -500, -501, -502, -503, -504 § § JURY TRIAL DEMANDED § |
| GOOGLE LLC, Defendant. | |

**UNOPPOSED MOTION FOR LEAVE TO FILE RESPONSE
TO MOTION TO DISMISS UNDER SEAL**

Plaintiffs Uniloc 2017, LLC and Uniloc USA, Inc. (collectively “Uniloc”) respectfully request leave to file Uniloc’s response to Defendant Google’s LLC’s (“Google”) Motions to Dismiss in the above referenced cases under seal. In support of its unopposed Motion, Plaintiffs state as follows:

1. On the below-referenced dates, Defendants filed similar Motions to Dismiss. Through extensions, the current response dates for each motion is as indicated.

| Case Number | Lawsuit Date | Motion to Dismiss | Response Date |
|---------------|--------------|-------------------|---------------|
| 2:2018cv00491 | 11/17/2018 | 4/19/2019 | 5/20/2019 |
| 2:2018cv00492 | 11/17/2018 | 4/19/2019 | 5/20/2019 |
| 2:2018cv00493 | 11/17/2018 | 4/26/2019 | 5/20/2019 |
| 2:2018cv00494 | 11/17/2018 | 4/26/2019 | 5/20/2019 |
| 2:2018cv00495 | 11/17/2018 | 5/8/2019 | 5/22/2019 |
| 2:2018cv00496 | 11/17/2018 | 4/19/2019 | 5/20/2019 |
| 2:2018cv00497 | 11/17/2018 | 4/26/2019 | 5/20/2019 |
| 2:2018cv00498 | 11/17/2018 | 5/8/2019 | 5/22/2019 |
| 2:2018cv00499 | 11/17/2018 | 4/19/2019 | 5/20/2019 |
| 2:2018cv00500 | 11/17/2018 | 4/19/2019 | 5/20/2019 |
| 2:2018cv00501 | 11/17/2018 | 5/8/2019 | 5/22/2019 |
| 2:2018cv00502 | 11/17/2018 | 5/8/2019 | 5/22/2019 |
| 2:2018cv00503 | 11/17/2018 | 4/26/2019 | 5/20/2019 |
| 2:2018cv00504 | 11/17/2018 | 4/26/2019 | 5/20/2019 |

2. A Protective Order has not been entered in this matter. Plaintiffs intend to file Responses. In doing so, Plaintiffs will reference confidential information necessitating a need to file the Responses under seal.

3. Counsel for Plaintiffs conferred with counsel for the Defendant regarding the requested relief. Counsel for the Defendant does not oppose Plaintiffs' request to file the Responses under seal.

4.

Dated: May 20, 2019

Respectfully submitted,

By: /s/ Ryan S. Loveless

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ATTORNEYS FOR UNILOC

CERTIFICATE OF CONFERENCE

Counsel for Plaintiffs has conferred with counsel for Defendant. Defendant has indicated that they are unopposed to this motion.

/s/ Ryan S. Loveless
Ryan S. Loveless

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this May 20, 2019, with a copy of this document via the Court's CM/ECF system.

/s/ Ryan S. Loveless
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